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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

AUG 12 1998

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of	)	CC Docket No. 97-21
	)	CC Docket No. <u>96-45</u>
USAC Plan of Reorganization	)	DA 98-1336

**REPLY COMMENTS OF SPRINT CORPORATION**

Sprint Corporation ("Sprint") hereby respectfully submits its reply to the comments filed August 5, 1998 in this matter.

Sprint continues to assert that the reorganization proposed herein is acceptable to the extent it works to support the Commission's goals of effectively and efficiently administering the universal service fund. However, Sprint shares the concern expressed by Intermedia, GTE, and BellSouth that certain proposals put forth by the Rural Health Care Corporation ("RHCC") would do little more than add layers of administration to the management of the fund.

RHCC appears to want some measure of control over issues effecting rural health care. Its suggestion is that special committees of the USAC board be created – one of which would specialize in rural health care issues – that would be able to bind the board. Although Sprint understands and appreciates the concerns expressed by RHCC, there is a larger issue at hand. The problem, of course, is that underlying this recommendation is the suggestion that the USAC board maintains a *policy-making* role with respect to the fund. Sprint is less concerned with the existence (or non-existence) of a rural health care committee

and its powers than it is with the policy-making role of USAC and its related corporations, divisions, and/or committees. As the Commission is well aware, only *it* has the authority to make policy decisions and interpret the Act with respect to the fund. Sprint concurs with BellSouth's assertion that several critical policy decisions have been made by USAC and its subsidiary entities that should have had Commission public notice and comment periods (BellSouth at p. 4). Sprint, therefore, joins Intermedia, GTE and BellSouth in calling for the Commission to act in a timely fashion to make policy determinations regarding the non-administrative aspects of the fund so that USAC's role is not expanded, by default, into that of a policy-making body.

GTE suggests that, to streamline further the administration of the fund, the Commission should adopt a distribution method that directly reimburses schools and libraries rather than the service providers (GTE at p. 4). Such a process would, according to GTE, cut down on the time required for schools and libraries to receive fund support, as well as eliminate many of the administrative details that currently burden service providers. Sprint echoes GTE's arguments on this point. Making the service provider the "middle man" in the funding process serves no legitimate purpose and adds little more than time and expense

to the process. The Commission should seize this opportunity to make the reimbursement process more efficient and adopt GTE's suggestion forthwith.

Respectfully submitted,  
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August 12, 1998

## **CERTIFICATE OF SERVICE**

I, Melinda L. Mills, hereby certify that I have on this 12<sup>th</sup> day of August 1998, served via U.S. First Class Mail, postage prepaid, or Hand Delivery, a copy of the foregoing "Reply Comments of Sprint Corporation" in the Matter of USAC Plan of Reorganization, CC Docket Nos. 97-21 and 96-45, DA 98-1336, filed this date with the Secretary, Federal Communications Commission, to the persons on the attached service list.

  
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